

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United American Muslim Association of New York, Inc.

(b) County of Residence of First Listed Plaintiff Philadelphia County
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)
Stan Shnayder, Esq.; Kats, Jamison & Associates
1 Bustleton Pike, Feasterville, PA 19053
T: (215) 396-9001 / F: (215) 396-8388

DEFENDANTS

Great American Insurance Group d/b/a Great American Insurance Company

County of Residence of First Listed Defendant Hamilton County
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)
Alexandra Rogin; Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place, 50 S. 16th St., Floor 22, Philadelphia, PA 19102
T: (302) 552-293 / F: (302) 574-7401

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- | | |
|--|---|
| <input type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) |
| <input type="checkbox"/> 2 U.S. Government Defendant | <input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) |

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
(For Diversity Cases Only)

| | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|---------------------------------------|---|---------------------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input checked="" type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES |
|--|--|---|--|---|
| <input checked="" type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/ Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act | SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) |
| | | | FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deparation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |

V. ORIGIN (Place an "X" in One Box Only)

- | | | | | | | |
|--|--|--|---|--|--|---|
| <input type="checkbox"/> 1 Original Proceeding | <input checked="" type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from Another District (specify) | <input type="checkbox"/> 6 Multidistrict Litigation - Transfer | <input type="checkbox"/> 8 Multidistrict Litigation - Direct File |
|--|--|--|---|--|--|---|

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. 1332

VI. CAUSE OF ACTION

Brief description of cause:
Plaintiff alleges defendant breached an insurance policy by not paying a claim

VII. REQUESTED IN COMPLAINT:

 CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ **264,672.06** CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

5/7/19

SIGNATURE OF ATTORNEY OF RECORD

Alexander R.

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: Kats, Jamison & Associates, 1 Bustleton Pike, Feasterville, PA 19053Address of Defendant: Eckert Seamans Cherin & Mellott, LLC, Two Liberty Place, 50 S. 16th Street, Floor 22, Philadelphia, PA 19102Place of Accident, Incident or Transaction: Pennsylvania

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when Yes is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case is / is not related to any case now pending or within one year previously terminated action in this court except as noted above.DATE: 05/07/2019Alexandra Rogin
Attorney-at-Law / Pro Se Plaintiff3220189

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
 - 2. FELA
 - 3. Jones Act-Personal Injury
 - 4. Antitrust
 - 5. Patent
 - 6. Labor-Management Relations
 - 7. Civil Rights
 - 8. Habeas Corpus
 - 9. Securities Act(s) Cases
 - 10. Social Security Review Cases
 - 11. All other Federal Question Cases
- (Please specify): _____

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
- 2. Airplane Personal Injury
- 3. Assault, Defamation
- 4. Marine Personal Injury
- 5. Motor Vehicle Personal Injury
- 6. Other Personal Injury (Please specify): _____
- 7. Products Liability
- 8. Products Liability – Asbestos
- 9. All other Diversity Cases
(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, Alexandra D. Rogin, Esq., counsel of record or pro se plaintiff, do hereby certify:

- Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- Relief other than monetary damages is sought.

DATE: 05/07/2019Alexandra Rogin
Attorney-at-Law / Pro Se Plaintiff322018

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: **Kats, Jamison & Associates, 1 Bustleton Pike, Feasterville, PA 19053**

Address of Defendant: **Eckert Seamans Cherin & Mellott, LLC, Two Liberty Place, 50 S. 16th Street, Floor 22, Philadelphia, PA 19102**

Place of Accident, Incident or Transaction: **Pennsylvania**

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case is / is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: **05/07/2019**

Alexandra Rogin
Attorney-at-Law / Pro Se Plaintiff

3220189

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)**A. Federal Question Cases:**

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
- 2. FELA
- 3. Jones Act-Personal Injury
- 4. Antitrust
- 5. Patent
- 6. Labor-Management Relations
- 7. Civil Rights
- 8. Habeas Corpus
- 9. Securities Act(s) Cases
- 10. Social Security Review Cases
- 11. All other Federal Question Cases
(Please specify): _____

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
- 2. Airplane Personal Injury
- 3. Assault, Defamation
- 4. Marine Personal Injury
- 5. Motor Vehicle Personal Injury
- 6. Other Personal Injury *(Please specify):* _____
- 7. Products Liability
- 8. Products Liability – Asbestos
- 9. All other Diversity Cases
(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, **Alexandra D. Rogin, Esq.**, counsel of record or pro se plaintiff, do hereby certify:

Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

Relief other than monetary damages is sought.

DATE: **05/07/2019**

Alexandra Rogin
Attorney-at-Law / Pro Se Plaintiff

322018

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

United American Muslim Association of
New York, Inc.

:

CIVIL ACTION

v.

Great American Insurance Group d/b/a
Great American Insurance Company

:

NO.

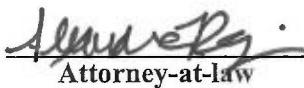
In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (x)

May 7, 2019

Date



Attorney-at-law

Defendant

Attorney for

215-851-8401

Telephone

215-851-8383

FAX Number

arogin@eckertseamans.com
E-Mail Address

**Civil Justice Expense and Delay Reduction Plan
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 40.1 and 72.1, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS
(See §1.02 (e) Management Track Definitions of the
Civil Justice Expense and Delay Reduction Plan)**

Special Management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED AMERICAN MUSLIM
ASSOCIATION OF NEW YORK, INC.,

Plaintiff,

v.

Case No.: _____

GREAT AMERICAN INSURANCE GROUP
D/B/A GREAT AMERICAN INSURANCE
COMPANY,

Defendant.

DEFENDANT'S NOTICE OF REMOVAL

Defendant, Great American Insurance Company (“Great American”), incorrectly sued as Great American Insurance Group d/b/a Great American Insurance Company, hereby gives notice of the removal to this Court of the case styled *United American Muslim Association of New York, Inc. v. Great American Insurance Group d/b/a Great American Insurance Company*, Case ID 190400048 from the Philadelphia County Court of Common Pleas, Pennsylvania, pursuant to 28 U.S.C. § 1441, *et seq.*, based upon the following grounds:

1. On April 1, 2019, plaintiff, United American Muslim Association of New York, Inc. (“UAMA”) filed a complaint against Great American in the Court of Common Pleas for the County of Philadelphia, Pennsylvania. (Compl., Ex. 1.)
2. By attaching a copy of the complaint hereto as Exhibit 1, Great American has complied with the requirement under 28 U.S.C. § 1446(a) that it file copies of all process, pleadings, and orders it has received in connection with the complaint.
3. Great American received the complaint via certified mail on April 18, 2019.

4. This Notice of Removal is filed within 30 days of April 18, 2019, and, therefore, removal of this action is timely under 28 U.S.C. § 1446(b).

5. This action is properly removed to this Court under 28 U.S.C. § 1441 because this district/division embraces the place where the complaint is pending.

6. Great American is the only defendant named in this action, so the requirement that all defendants consent to removal in certain circumstances does not apply. *See* 28 U.S.C. § 1446(b).

7. Removal of this action is appropriate under 28 U.S.C. § 1441(a) because the Court has original jurisdiction over this matter under 28 U.S.C. § 1332(a) since the parties are citizens of different states and the amount in controversy exceeds \$75,000 exclusive of interest.

8. Great American is a citizen of Ohio under 28 U.S.C. § 1332(c)(1) because it was incorporated by, and maintains its principal place of business in, Ohio.

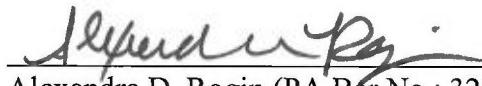
9. UAMA is a citizen of New York under 28 U.S.C. § 1332(c)(1) because it was incorporated by New York, and, upon information and belief, maintains its principal place of business in New York.

10. The fact that UAMA seeks to recover an amount in excess of \$75,000 is demonstrated by the estimate for repairs attached to the complaint as Exhibit A. (*See* Compl., Ex. 1, at Ex. A (p. 19))

11. Pursuant to 28 U.S.C. § 1446(d), Great American will promptly file a copy of this notice of removal with the Philadelphia County Court of Common Pleas, Pennsylvania, and serve it on counsel for UAMA.

12. Written notice of the filing of this Notice of Removal will be promptly served upon Plaintiff.

Respectfully submitted,



Alexandra D. Rogin (PA Bar No.: 322018)
ECKERT SEAMANS CHERIN & MELLOTT, LLC
Two Liberty Place
50 South 16th Street
22nd Floor
Philadelphia, PA 19102
Tel: (215) 851-8401
Fax: (215) 851-8383
Email: arogin@eckertseamans.com

Michael A. Graziano (*pro hac vice* anticipated)
ECKERT SEAMANS CHERIN & MELLOTT, LLC
1717 Pennsylvania Avenue, N.W., Suite 1200
Washington, D.C. 20006
Tel: (202) 659-6671
Fax: (202) 659-6699
Email: m.graziano@eckertseamans.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Notice of Removal was served via email and first-class U.S. Mail, postage prepaid, this 7th day of May, 2019, on the following counsel of record:

Stan Shnayder, Esq.
Kats, Jamison & Associates
1 Bustleton Pike
Feasterville, PA 19053

Steven Feinstein, Esq.
Feinstein Law Office
107 Wayne Court
West Chester, PA 19380

Counsel for Plaintiff

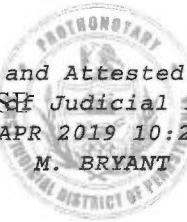


Alexandra Rogin, Esq.

Exhibit A

KATS, JAMISON & ASSOCIATES
 By: STAN SHNAYDER, ESQUIRE
 Identification No.: 310913
 1 Bustleton Pike
 Feasterville, PA 19053
 (215) 396-9001

Filed and Attested by the
MAJOR CASE Judicial Records
 01 APR 2019 10:26 am
 M. BRYANT



Attorney for Plaintiff

UNITED AMERICAN MUSLIM
 ASSOCIATION OF NEW YORK, INC.
 4800 Beaver Dam Road
 Bristol PA 19007

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS
 APRIL TERM, 2019
 No.

v.

GREAT AMERICAN INSURANCE GROUP
 D/B/A GREAT AMERICAN INSURANCE
 COMPANY
 301 E. Fourth Street
 Cincinnati, OH 45202

**NOTICE TO DEFEND
 COMPLAINT IN CIVIL ACTION**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.
You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
 Lawyer Referral and Information Service
 One Reading Center
 Philadelphia, Pennsylvania 19107
 (215) 238-6333
 TTY (215) 451-6197

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentir una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por teléfono a la oficina cuya dirección se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociación De Licenciados
 De Filadelfia
 Servicio De Referencia E
 Información Legal
 One Reading Center
 Filadelfia, Pennsylvania 19107
 (215) 238-6333
 TTY (215) 451-6197

KATS, JAMISON & ASSOCIATES
By: STAN SHNAYDER, ESQUIRE
Identification No.: 310913
1 Bustleton Pike
Feasterville, PA 19053
(215) 396-9001

MAJOR CASE

Attorney for Plaintiff

| | | |
|---|---|--|
| UNITED AMERICAN MUSLIM ASSOCIATION OF NEW YORK, INC. | : | PHILADELPHIA COUNTY COURT OF COMMON PLEAS |
| 4800 Beaver Dam Road | : | APRIL TERM, 2019 |
| Bristol PA 19007 | : | No. |
| v. | : | |
| GREAT AMERICAN INSURANCE GROUP D/B/A GREAT AMERICAN INSURANCE COMPANY | : | |
| 301 E. Fourth Street | : | |
| Cincinnati, OH 45202 | : | |

CIVIL ACTION

1. Plaintiff, United American Muslim Association of New York, Inc., is a corporation organized and existing under the laws of the State of New York, authorized to do business in the Commonwealth of Pennsylvania and having offices located at 4800 Beaver Dam Road, Bristol PA 19007

2. Defendant, Great American Insurance Group d/b/a Great American Insurance Company, is a corporation duly organized and existing which is licensed to issue policies of insurance in the Commonwealth of Pennsylvania and maintains its principal place of business at 301 E. Fourth Street, Cincinnati, OH 45202. Defendant regularly conducts business in the City and County of Philadelphia.

3. Defendant in its regular course of business issued to Plaintiff a policy of insurance, policy number PAC 174-33-91-00 covering a property Plaintiff owns located and situate as 5201 Emilie Road Levittown, PA 19057. Plaintiff is not in possession of the entire policy and it is alleged that said policy is in the possession of Defendant.

4. At all times material hereto, Defendant was acting either individually or through its duly authorized agents, servants, workmen or employees, who were acting within the course and scope of their employment and on the business of said employer.

5. On or about January 9, 2018, while said policy of insurance was in full force and effect, Plaintiff suffered a sudden and accidental direct physical loss to the insured premises, resulting in damage to the insured premises in those areas and to the extent set forth in the building estimate of JS Held, a true and correct copy of which is attached hereto, made part hereof, and marked Exhibit "A".

6. Notice of Plaintiff's covered loss was given to Defendant in a prompt and timely manner and Plaintiff has done and otherwise performed all things required of them under the policy of insurance issued by Defendant, including cooperating with Defendant's investigation; mitigating damages where reasonable, required and/or possible; providing Defendant with all available information and complying with all conditions precedent.

7. Defendant, despite demand for benefits under its policy of insurance has failed and refused to pay to Plaintiffs those benefits due and owing under said policy of insurance.

8. Defendant has breached its contractual obligations to pay benefits to Plaintiffs for a loss covered under Defendant's policy of insurance.

9. Solely as a result of Defendant's failure and refusal to pay benefits to Plaintiffs as required under the aforementioned policy of insurance, Plaintiffs have suffered loss and damage in an amount in excess of \$50,000.00.

WHEREFORE, Plaintiffs demand judgment against Defendant in an amount in excess of \$50,000.00 together with interest and costs.

KATS, JAMISON & ASSOCIATES

BY: _____

STAN SHNAYDER, ESQUIRE
Attorney for Plaintiff

Date: April 1, 2019

VERIFICATION

Plaintiff hereby states that the statements made in the foregoing complaint are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements therein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Date: 3/29/2019



Erdinc Turkmen on behalf
of United American Muslim Association

EXHIBIT “A”



1845 Walnut St. Suite 2300
Philadelphia, PA 19103
(P) 267-479-0410
(F) 267-479-0415

Client: United American Muslim
Property: 5201 Emile Rd.
Levittown, PA 19057

Operator: PHASAN

Type of Estimate: <NONE>
Date Entered: 3/5/2018 Date Assigned:

Price List: PAPH8X_FEB18
Labor Efficiency: Restoration/Service/Remodel
Estimate: 18010765-UNITED-MUSL

This estimate is based on a site inspection completed by Patrick Hasan on 02/14/18 & 02/27/2018. This opinion of probable cost is based on the level of detail of "as-built" conditions provided to us by site inspections. We have not been provided any plans for the structure, nor was demolition complete at time of inspection.

General Building Description: School

Cause of Damage: Water via frozen pipes

Scope Recap: Removal and replacement/repair of water damaged interior finishes & components. This opinion reflects J.S. Held's assumption of the pre-loss configuration. The pricing contemplates the use of contemporary materials of "like, kind and quality". Furthermore, this evaluation is governed by the following assumptions and exclusions.

Assumptions:

- Access given by Insured Representatives
- Environmental Report prepared by LEA
- Field Measurements
- Floor Plans by Insured
- Information and documentation received and reviewed to date

Exclusions:

- ACM/Lead/Mold separate
- Code Upgrades (Unless it is included above)
- Permit fees (excluded/TBD)
- Architectural & Engineering fees (excluded/TBD)

This estimate is subject to review by the Insurance Carrier(s) per contract/policy terms and conditions.

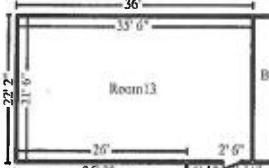
J.S. Held LLC recommends that all costs that are anticipated to be part of the claim are submitted for review prior to executing contracts. To the extent that repair costs proceed on a time and materials basis, we recommend that the adjustment team monitor these repairs and that the insured keep appropriate records, sign in sheets and documentation of these repairs. This document is prepared for the adjustment team. Reliance upon this document are for the sole use of the intended recipients. J.S. Held LLC reserves the right to change their opinion should further information become available following the preparation of this presentation.



1845 Walnut St. Suite 2300
 Philadelphia, PA 19103
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18010765-UNITED-MUSL

2nd Floor

|  | | Room 13 | | | Height: 8' | |
|---|--|----------------|----------------------------|--|---------------------------|--|
| | | | 912.77 SF Walls | | 764.69 SF Ceiling | |
| | | | 1677.46 SF Walls & Ceiling | | 764.69 SF Floor | |
| | | | 84.97 SY Flooring | | 114.10 LF Floor Perimeter | |
| | | | 114.10 LF Ceil. Perimeter | | | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------------|-------------------|------------|----------------|------------|----------------|------------|
| 1. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 191.17 SF | 1.84 | 5.62 | 71.46 | 428.83 | (146.39) | 282.44 |
| 2. R&R Acoustic ceiling tile furring | 191.17 SF | 0.81 | 2.29 | 31.44 | 188.58 | (55.13) | 133.45 |
| 3. R&R Acoustic ceiling tile | 191.17 SF | 3.43 | 17.55 | 134.66 | 807.93 | (291.14) | 516.79 |
| 4. Seal & paint acoustic ceiling tile | 764.69 SF | 0.95 | 13.31 | 147.96 | 887.73 | (443.87) | 443.86 |
| 5. R&R Fluorescent light fixture | 2.00 EA | 112.41 | 6.27 | 46.22 | 277.31 | (249.21) | 28.10 |
| 6. Paint masonry | 912.77 SF | 0.69 | 15.33 | 129.02 | 774.16 | (387.10) | 387.06 |
| 7. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 8. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| HAZ-MAT | | | | | | | |
| 9. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 10. Tear out asbestos vinyl floor covering (no haul off) | 764.69 SF | 2.84 | 7.80 | 435.90 | 2,615.42 | (0.00) | 2,615.42 |
| 11. Remove asbestos floor mastic (no haul off) | 764.69 SF | 3.47 | 2.29 | 531.16 | 3,186.92 | (0.00) | 3,186.92 |
| 12. HEPA Vacuuming - Detailed - (PER SF) | 764.69 SF | 0.75 | 41.29 | 114.70 | 729.51 | (0.00) | 729.51 |
| 13. Clean the floor | 764.69 SF | 0.50 | 28.02 | 76.58 | 486.95 | (0.00) | 486.95 |
| 14. Floor leveling cement / patch-in | 764.69 SF | 2.50 | 34.41 | 389.22 | 2,335.36 | (2,335.36) | 0.00 |
| 15. Vinyl tile | 764.69 SF | 3.51 | 101.40 | 557.10 | 3,342.56 | (3,342.56) | 0.00 |
| 16. Cove base molding - rubber or vinyl, 6" high | 114.10 LF | 2.46 | 11.64 | 58.46 | 350.79 | (350.79) | 0.00 |
| Totals: Room13 | | | 289.22 | 2,738.24 | 16,499.59 | 7,634.06 | 8,865.53 |

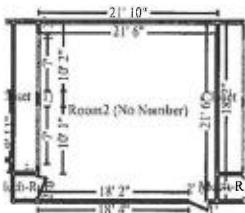


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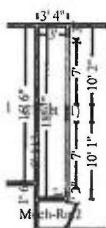
**Bathroom-1****Height: 8'**

| | |
|---------------------------|--------------------------|
| 536.46 SF Walls | 227.32 SF Ceiling |
| 763.78 SF Walls & Ceiling | 227.32 SF Floor |
| 25.26 SY Flooring | 67.06 LF Floor Perimeter |
| 67.06 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------|------------|-------|--------|----------|-----------------|-----------------|
| 17. General Demolition - per hour - labor time to remove/dispose of portion of plaster ceiling & lath* | 24.00 HR | 42.03 | 0.00 | 201.74 | 1,210.46 | (0.00) | 1,210.46 |
| 18. R&R Suspended ceiling system - 2' x 4' | 227.32 SF | 3.36 | 18.55 | 156.48 | 938.82 | (357.65) | 581.17 |
| 19. R&R Fluorescent - acoustic grid fixture - 4 tube - High grd | 2.00 EA | 367.33 | 25.23 | 151.96 | 911.85 | (883.75) | 28.10 |
| 20. Seal/prime then paint more than the ceiling perimeter (2 coats) | 223.52 SF | 0.74 | 2.15 | 33.52 | 201.07 | (100.54) | 100.53 |
| 21. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| Totals: Bathroom-1 | | | 46.17 | 548.60 | 3,291.66 | 1,356.68 | 1,934.98 |

**Room2 (No Number)****Height: 8'**

| | |
|----------------------------|--------------------------|
| 595.13 SF Walls | 462.87 SF Ceiling |
| 1057.99 SF Walls & Ceiling | 462.87 SF Floor |
| 51.43 SY Flooring | 72.06 LF Floor Perimeter |
| 86.06 LF Ceil. Perimeter | |

**Subroom: Closet (1)****Height: 8'**

| | |
|---------------------------|--------------------------|
| 245.79 SF Walls | 54.59 SF Ceiling |
| 300.38 SF Walls & Ceiling | 54.59 SF Floor |
| 6.07 SY Flooring | 28.39 LF Floor Perimeter |
| 42.39 LF Ceil. Perimeter | |

Missing Wall - Goes to Floor**7' X 6' 8"****Opens into ROOM2_NO_NU****Missing Wall - Goes to Floor****7' X 6' 8"****Opens into ROOM2_NO_NU**

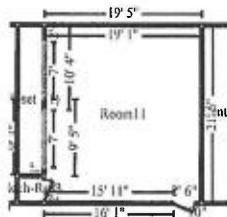
| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|----------|------------|------|-------|--------|---------|-------|
| 22. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 54.59 SF | 1.84 | 1.61 | 20.40 | 122.46 | (41.80) | 80.66 |
| 23. R&R Acoustic ceiling tile furring | 54.59 SF | 0.81 | 0.66 | 9.00 | 53.88 | (15.74) | 38.14 |



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CONTINUED - Room2 (No Number)

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|---------------|-----------------|------------------|-----------------|-----------------|
| 24. R&R Acoustic ceiling tile | 54.59 SF | 3.43 | 5.01 | 38.46 | 230.72 | (83.14) | 147.58 |
| 25. Seal & paint acoustic ceiling tile | 54.59 SF | 0.95 | 0.95 | 10.58 | 63.39 | (31.71) | 31.68 |
| 26. Paint masonry | 840.92 SF | 0.69 | 14.13 | 118.86 | 713.22 | (356.63) | 356.59 |
| 27. Paint door/window trim & jamb - 2 coats (per side) | 2.00 EA | 24.32 | 0.48 | 9.82 | 58.94 | (29.48) | 29.46 |
| 28. Paint door slab only - 2 coats (per side) | 2.00 EA | 29.22 | 0.79 | 11.84 | 71.07 | (35.54) | 35.53 |
| HAZ-MAT | | | | | | | |
| 29. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 30. Tear out asbestos vinyl floor covering (no haul off) | 517.45 SF | 2.84 | 5.28 | 294.98 | 1,769.82 | (0.00) | 1,769.82 |
| 31. Remove asbestos floor mastic (no haul off) | 517.45 SF | 3.47 | 1.55 | 359.44 | 2,156.54 | (0.00) | 2,156.54 |
| 32. HEPA Vacuuming - Detailed - (PER SF) | 517.45 SF | 0.75 | 27.95 | 77.62 | 493.66 | (0.00) | 493.66 |
| 33. Clean the floor | 517.45 SF | 0.50 | 18.96 | 51.80 | 329.49 | (0.00) | 329.49 |
| 34. Floor leveling cement / patch-in | 517.45 SF | 2.50 | 23.29 | 263.38 | 1,580.30 | (1,580.30) | 0.00 |
| 35. Vinyl tile | 517.45 SF | 3.51 | 68.61 | 376.98 | 2,261.84 | (2,261.84) | 0.00 |
| 36. Cove base molding - rubber or vinyl, 6" high | 100.45 LF | 2.46 | 10.25 | 51.48 | 308.84 | (308.84) | 0.00 |
| Totals: Room2 (No Number) | | | 180.88 | 1,698.18 | 10,236.71 | 4,745.02 | 5,491.69 |



Room11

Height: 8'

| | |
|---------------------------|--------------------------|
| 556.88 SF Walls | 411.40 SF Ceiling |
| 968.28 SF Walls & Ceiling | 411.40 SF Floor |
| 45.71 SY Flooring | 67.28 LF Floor Perimeter |
| 81.28 LF Ceil. Perimeter | |



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Subroom: Closet (1)
Height: 8'

| | |
|---------------------------|--------------------------|
| 245.79 SF Walls | 54.59 SF Ceiling |
| 300.38 SF Walls & Ceiling | 54.59 SF Floor |
| 6.07 SY Flooring | 28.39 LF Floor Perimeter |
| 42.39 LF Ceil. Perimeter | |

Missing Wall - Goes to Floor
7' X 6' 8"
Opens into ROOM1
Missing Wall - Goes to Floor
7' X 6' 8"
Opens into ROOM1

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------|------------|-------|--------|----------|------------|----------|
| 37. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 54.59 SF | 1.84 | 1.61 | 20.40 | 122.46 | (41.80) | 80.66 |
| 38. R&R Acoustic ceiling tile furring | 54.59 SF | 0.81 | 0.66 | 9.00 | 53.88 | (15.74) | 38.14 |
| 39. R&R Acoustic ceiling tile | 54.59 SF | 3.43 | 5.01 | 38.46 | 230.72 | (83.14) | 147.58 |
| 40. Seal & paint acoustic ceiling tile | 54.59 SF | 0.95 | 0.95 | 10.58 | 63.39 | (31.71) | 31.68 |
| 41. Paint masonry | 802.67 SF | 0.69 | 13.49 | 113.46 | 680.79 | (340.41) | 340.38 |
| 42. Detach & Reset Classroom cabinetry - coat hook bar* | 54.59 LF | 7.00 | 0.00 | 76.42 | 458.55 | (0.00) | 458.55 |
| 43. Paint door/window trim & jamb - 2 coats (per side) | 2.00 EA | 24.32 | 0.48 | 9.82 | 58.94 | (29.48) | 29.46 |
| 44. Paint door slab only - 2 coats (per side) | 2.00 EA | 29.22 | 0.79 | 11.84 | 71.07 | (35.54) | 35.53 |
| HAZ-MAT | | | | | | | |
| 45. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 46. Tear out asbestos vinyl floor covering (no haul off) | 465.99 SF | 2.84 | 4.75 | 265.64 | 1,593.80 | (0.00) | 1,593.80 |
| 47. Remove asbestos floor mastic (no haul off) | 465.99 SF | 3.47 | 1.40 | 323.68 | 1,942.07 | (0.00) | 1,942.07 |
| 48. HEPA Vacuuming - Detailed - (PER SF) | 465.99 SF | 0.75 | 25.16 | 69.90 | 444.55 | (0.00) | 444.55 |
| 49. Clean the floor | 465.99 SF | 0.50 | 17.08 | 46.66 | 296.74 | (0.00) | 296.74 |
| 50. Floor leveling cement / patch-in | 465.99 SF | 2.50 | 20.97 | 237.20 | 1,423.15 | (1,423.15) | 0.00 |
| 51. Vinyl tile | 465.99 SF | 3.51 | 61.79 | 339.48 | 2,036.89 | (2,036.89) | 0.00 |
| 52. Cove base molding - rubber or vinyl, 6" high | 95.67 LF | 2.46 | 9.76 | 49.04 | 294.15 | (294.15) | 0.00 |

Totals: Room11
165.26 1,625.12 9,793.69 4,332.01 5,461.68

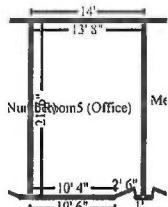


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**Room4 (No Number)****Height: 8'**

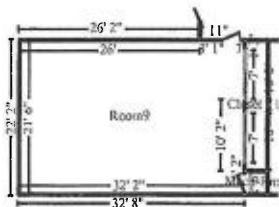
| | |
|---------------------------|--------------------------|
| 472.04 SF Walls | 171.67 SF Ceiling |
| 643.71 SF Walls & Ceiling | 171.67 SF Floor |
| 19.07 SY Flooring | 59.01 LF Floor Perimeter |
| 59.01 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------------|-------------------|--------------|----------------|---------------|----------------|-------------|
| 53. Floor prep (scrape rubber back residue) | 171.67 SF | 0.59 | 0.00 | 20.26 | 121.55 | (121.55) | 0.00 |
| 54. Glue down carpet | 197.42 SF | 2.25 | 20.14 | 92.86 | 557.20 | (557.20) | 0.00 |
| 15 % waste added for Glue down carpet. | | | | | | | |
| 55. Cove base molding - rubber or vinyl, 4" high | 59.01 LF | 1.93 | 4.14 | 23.60 | 141.63 | (141.63) | 0.00 |
| Totals: Room4 (No Number) | | | 24.28 | 136.72 | 820.38 | 820.38 | 0.00 |

**Room5 (Office)****Height: 8'**

| | |
|---------------------------|--------------------------|
| 563.13 SF Walls | 294.23 SF Ceiling |
| 857.35 SF Walls & Ceiling | 294.23 SF Floor |
| 32.69 SY Flooring | 70.39 LF Floor Perimeter |
| 70.39 LF Ceil. Perimeter | |

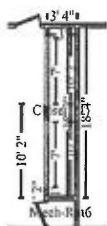
| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------------|-------------------|--------------|----------------|-----------------|-----------------|-------------|
| 56. Floor prep (scrape rubber back residue) | 294.23 SF | 0.59 | 0.00 | 34.72 | 208.32 | (208.32) | 0.00 |
| 57. Glue down carpet | 338.36 SF | 2.25 | 34.51 | 159.16 | 954.98 | (954.98) | 0.00 |
| 15 % waste added for Glue down carpet. | | | | | | | |
| 58. Cove base molding - rubber or vinyl, 4" high | 70.39 LF | 1.93 | 4.94 | 28.16 | 168.95 | (168.95) | 0.00 |
| Totals: Room5 (Office) | | | 39.45 | 222.04 | 1,332.25 | 1,332.25 | 0.00 |

**Room9****Height: 8'**

| | |
|----------------------------|--------------------------|
| 766.10 SF Walls | 692.92 SF Ceiling |
| 1459.03 SF Walls & Ceiling | 692.92 SF Floor |
| 76.99 SY Flooring | 93.43 LF Floor Perimeter |
| 107.43 LF Ceil. Perimeter | |



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Subroom: Closet (1)

Height: 8'

| | |
|---------------------------|--------------------------|
| 245.33 SF Walls | 54.50 SF Ceiling |
| 299.83 SF Walls & Ceiling | 54.50 SF Floor |
| 6.06 SY Flooring | 28.33 LF Floor Perimeter |
| 42.33 LF Ceil. Perimeter | |

Missing Wall - Goes to Floor

7' X 6' 8"

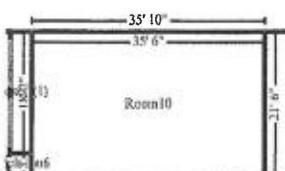
Opens into ROOM9

Missing Wall - Goes to Floor

7' X 6' 8"

Opens into ROOM9

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-------------|------------|---------------|-----------------|------------------|-----------------|-----------------|
| HAZ-MAT | | | | | | | |
| 59. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 60. Tear out asbestos vinyl floor covering (no haul off) | 747.42 SF | 2.84 | 7.62 | 426.06 | 2,556.35 | (0.00) | 2,556.35 |
| 61. Remove asbestos floor mastic (no haul off) | 747.42 SF | 3.47 | 2.24 | 519.16 | 3,114.95 | (0.00) | 3,114.95 |
| 62. HEPA Vacuuming - Detailed - (PER SF) | 747.42 SF | 0.75 | 40.36 | 112.12 | 713.05 | (0.00) | 713.05 |
| 63. Clean the floor | 747.42 SF | 0.50 | 27.39 | 74.84 | 475.94 | (0.00) | 475.94 |
| 64. Floor leveling cement / patch-in | 747.42 SF | 2.50 | 33.63 | 380.44 | 2,282.62 | (2,282.62) | 0.00 |
| 65. Vinyl tile | 747.42 SF | 3.51 | 99.11 | 544.50 | 3,267.05 | (3,267.05) | 0.00 |
| 66. Cove base molding - rubber or vinyl, 6" high | 121.76 LF | 2.46 | 12.42 | 62.38 | 374.33 | (374.33) | 0.00 |
| 67. Paint masonry | 1,011.44 SF | 0.69 | 16.99 | 142.98 | 857.86 | (428.95) | 428.91 |
| 68. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 69. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| Totals: Room9 | | | 241.76 | 2,276.84 | 13,729.69 | 6,385.46 | 7,344.23 |



Room10

Height: 8'

| | |
|----------------------------|---------------------------|
| 912.77 SF Walls | 764.69 SF Ceiling |
| 1677.46 SF Walls & Ceiling | 764.69 SF Floor |
| 84.97 SY Flooring | 114.10 LF Floor Perimeter |
| 114.10 LF Ceil. Perimeter | |

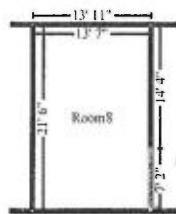
| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|----------|------------|------|------|-------|---------|-------|
| HAZ-MAT | | | | | | | |
| 70. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |



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CONTINUED - Room10

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------|------------|--------|----------|-----------|------------|----------|
| 71. Tear out asbestos vinyl floor covering (no haul off) | 764.69 SF | 2.84 | 7.80 | 435.90 | 2,615.42 | (0.00) | 2,615.42 |
| 72. Remove asbestos floor mastic (no haul off) | 764.69 SF | 3.47 | 2.29 | 531.16 | 3,186.92 | (0.00) | 3,186.92 |
| 73. HEPA Vacuuming - Detailed - (PER SF) | 764.69 SF | 0.75 | 41.29 | 114.70 | 729.51 | (0.00) | 729.51 |
| 74. Clean the floor | 764.69 SF | 0.50 | 28.02 | 76.58 | 486.95 | (0.00) | 486.95 |
| 75. Floor leveling cement / patch-in | 764.69 SF | 2.50 | 34.41 | 389.22 | 2,335.36 | (2,335.36) | 0.00 |
| 76. Vinyl tile | 764.69 SF | 3.51 | 101.40 | 557.10 | 3,342.56 | (3,342.56) | 0.00 |
| 77. Cove base molding - rubber or vinyl, 6" high | 114.10 LF | 2.46 | 11.64 | 58.46 | 350.79 | (350.79) | 0.00 |
| 78. Paint masonry | 912.77 SF | 0.69 | 15.33 | 129.02 | 774.16 | (387.10) | 387.06 |
| 79. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 80. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| Totals: Room10 | | | 244.18 | 2,306.50 | 13,909.21 | 6,448.32 | 7,460.89 |



Room8

Height: 8'

| | |
|---------------------------|--------------------------|
| 513.70 SF Walls | 292.01 SF Ceiling |
| 805.72 SF Walls & Ceiling | 292.01 SF Floor |
| 32.45 SY Flooring | 63.02 LF Floor Perimeter |
| 70.19 LF Cel. Perimeter | |

Missing Wall - Goes to Floor

7' 2" X 6' 8"

Opens into ROOM8

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|-------|--------|----------|----------|----------|
| HAZ-MAT | | | | | | | |
| 81. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 82. Tear out asbestos vinyl floor covering (no haul off) | 292.01 SF | 2.84 | 2.98 | 166.46 | 998.75 | (0.00) | 998.75 |
| 83. Remove asbestos floor mastic (no haul off) | 292.01 SF | 3.47 | 0.88 | 202.84 | 1,216.99 | (0.00) | 1,216.99 |
| 84. HEPA Vacuuming - Detailed - (PER SF) | 292.01 SF | 0.75 | 15.77 | 43.80 | 278.58 | (0.00) | 278.58 |
| 85. Clean the floor | 292.01 SF | 0.50 | 10.70 | 29.24 | 185.95 | (0.00) | 185.95 |
| 86. Floor leveling cement / patch-in | 292.01 SF | 2.50 | 13.14 | 148.62 | 891.79 | (891.79) | 0.00 |



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CONTINUED - Room8

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------------|---------------|-----------------|-----------------|-----------------|
| 87. Vinyl tile | 292.01 SF | 3.51 | 38.72 | 212.74 | 1,276.42 | (1,276.42) | 0.00 |
| 88. Cove base molding - rubber or vinyl, 6" high | 63.02 LF | 2.46 | 6.43 | 32.28 | 193.74 | (193.74) | 0.00 |
| 89. Paint masonry | 513.70 SF | 0.69 | 8.63 | 72.62 | 435.70 | (217.87) | 217.83 |
| 90. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | .24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 91. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| Totals: Room8 | | | 99.25 | 922.96 | 5,565.46 | 2,612.33 | 2,953.13 |



Room12

Height: 8'

| | |
|----------------------------|--------------------------|
| 723.98 SF Walls | 510.66 SF Ceiling |
| 1234.64 SF Walls & Ceiling | 510.66 SF Floor |
| 56.74 SY Flooring | 90.50 LF Floor Perimeter |
| 90.50 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------------|---------------|-----------------|-----------------|---------------|
| 92. Remove Glue down carpet | 510.66 SF | 0.53 | 0.00 | 54.14 | 324.79 | (0.00) | 324.79 |
| 93. Glue down carpet | 587.26 SF | 2.25 | 59.90 | 276.24 | 1,657.48 | (1,657.48) | 0.00 |
| 15 % waste added for Glue down carpet. | | | | | | | |
| 94. Floor prep (scrape rubber back residue) | 510.66 SF | 0.59 | 0.00 | 60.26 | 361.55 | (361.55) | 0.00 |
| 95. Cove base molding - rubber or vinyl, 6" high | 90.50 LF | 2.46 | 9.23 | 46.36 | 278.22 | (278.22) | 0.00 |
| Totals: Room12 | | | 69.13 | 437.00 | 2,622.04 | 2,297.25 | 324.79 |

Corridor

Height: 8'

| | |
|----------------------------|---------------------------|
| 2419.81 SF Walls | 1382.96 SF Ceiling |
| 3802.77 SF Walls & Ceiling | 1382.96 SF Floor |
| 153.66 SY Flooring | 301.98 LF Floor Perimeter |
| 304.98 LF Ceil. Perimeter | |

Missing Wall - Goes to Floor
 18010765-UNITED-MUSL

3' X 6' 8"

Opens into WOMENS_BATH

12/4/2018

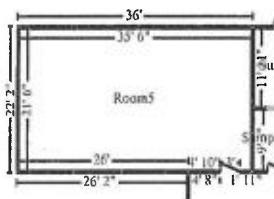
Page: 9

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| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|------------------------------|-------------|------------|--------------|---------------|-----------------|-------------|-----------------|
| 96. Clean floor, strip & wax | 1,382.96 SF | 0.73 | 80.69 | 203.42 | 1,293.67 | (0.00) | 1,293.67 |
| Totals: Corridor | | | 80.69 | 203.42 | 1,293.67 | 0.00 | 1,293.67 |

Total: 2nd Floor 1,480.27 13,115.62 79,094.35 37,963.76 41,130.59

Main Level**Room 5****Height: 8'**

| | |
|----------------------------|---------------------------|
| 912.77 SF Walls | 764.69 SF Ceiling |
| 1677.46 SF Walls & Ceiling | 764.69 SF Floor |
| 84.97 SY Flooring | 114.10 LF Floor Perimeter |
| 114.10 LF Ceil. Perimeter | |

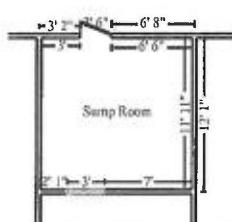
| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------|------------|--------|--------|----------|------------|----------|
| 97. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 191.17 SF | 1.84 | 5.62 | 71.46 | 428.83 | (146.39) | 282.44 |
| 98. R&R Acoustic ceiling tile furring | 191.17 SF | 0.81 | 2.29 | 31.44 | 188.58 | (55.13) | 133.45 |
| 99. R&R Acoustic ceiling tile | 191.17 SF | 3.43 | 17.55 | 134.66 | 807.93 | (291.14) | 516.79 |
| 100. Seal & paint acoustic ceiling tile | 764.69 SF | 0.95 | 13.31 | 147.96 | 887.73 | (443.87) | 443.86 |
| 101. R&R Fluorescent light fixture | 2.00 EA | 112.41 | 6.27 | 46.22 | 277.31 | (249.21) | 28.10 |
| 102. Remove Chalkboards, Tackboards, & Markerboards | 42.00 SF | 0.33 | 0.00 | 2.78 | 16.64 | (0.00) | 16.64 |
| 103. Install Chalkboards, Tackboards, & Markerboards | 42.00 SF | 2.21 | 0.00 | 18.56 | 111.38 | (0.00) | 111.38 |
| 104. Paint masonry | 912.77 SF | 0.69 | 15.33 | 129.02 | 774.16 | (387.10) | 387.06 |
| 105. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 106. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| HAZ-MAT | | | | | | | |
| 107. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 108. Tear out asbestos vinyl floor covering (no haul off) | 764.69 SF | 2.84 | 7.80 | 435.90 | 2,615.42 | (0.00) | 2,615.42 |
| 109. Remove asbestos floor mastic (no haul off) | 764.69 SF | 3.47 | 2.29 | 531.16 | 3,186.92 | (0.00) | 3,186.92 |
| 110. HEPA Vacuuming - Detailed - (PER SF) | 764.69 SF | 0.75 | 41.29 | 114.70 | 729.51 | (0.00) | 729.51 |
| 111. Clean the floor | 764.69 SF | 0.50 | 28.02 | 76.58 | 486.95 | (0.00) | 486.95 |
| 112. Floor leveling cement / patch-in | 764.69 SF | 2.50 | 34.41 | 389.22 | 2,335.36 | (2,335.36) | 0.00 |
| 113. Vinyl tile | 764.69 SF | 3.51 | 101.40 | 557.10 | 3,342.56 | (3,342.56) | 0.00 |
| 114. Cove base molding - rubber or vinyl, 6" high | 114.10 LF | 2.46 | 11.64 | 58.46 | 350.79 | (350.79) | 0.00 |



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CONTINUED - Room5

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---------------|----------|------------|--------|----------|-----------|----------|----------|
| Totals: Room5 | | | 289.22 | 2,759.58 | 16,627.61 | 7,634.06 | 8,993.55 |



Sump Room

Height: 8'

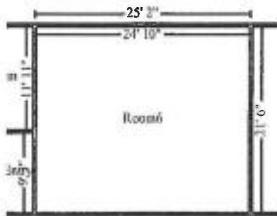
| | |
|---------------------------|--------------------------|
| 363.21 SF Walls | 143.41 SF Ceiling |
| 506.61 SF Walls & Ceiling | 143.41 SF Floor |
| 15.93 SY Flooring | 44.90 LF Floor Perimeter |
| 47.90 LF Ceil. Perimeter | |

Missing Wall - Goes to Floor

3' X 6' 8"

Opens into SUMP_PUMP_EN

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|--|-----------|------------|-------|--------|--------|----------|--------|
| 115. Stucco patch / small repair - ready for color | 1.00 EA | 170.02 | 0.96 | 34.20 | 205.18 | (129.25) | 75.93 |
| 116. Seal & paint stucco | 143.41 SF | 1.16 | 2.32 | 33.74 | 202.42 | (101.22) | 101.20 |
| 117. Paint masonry | 363.21 SF | 0.69 | 6.10 | 51.34 | 308.05 | (154.04) | 154.01 |
| 118. Paint concrete the floor | 143.41 SF | 0.74 | 1.64 | 21.54 | 129.30 | (64.66) | 64.64 |
| Totals: Sump Room | | | 11.02 | 140.82 | 844.95 | 449.17 | 395.78 |



Room6

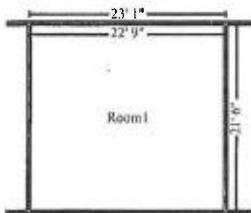
Height: 8'

| | |
|----------------------------|--------------------------|
| 741.79 SF Walls | 534.63 SF Ceiling |
| 1276.42 SF Walls & Ceiling | 534.63 SF Floor |
| 59.40 SY Flooring | 92.72 LF Floor Perimeter |
| 92.72 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|-------|--------|--------|----------|--------|
| 119. R&R Acoustic ceiling tile | 12.00 SF | 3.43 | 1.10 | 8.46 | 50.72 | (18.27) | 32.45 |
| 120. Seal & paint acoustic ceiling tile | 534.63 SF | 0.95 | 9.30 | 103.44 | 620.64 | (310.32) | 310.32 |
| Totals: Room6 | | | 10.40 | 111.90 | 671.36 | 328.59 | 342.77 |



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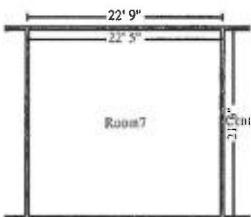


Room1

Height: 8'

| | |
|----------------------------|--------------------------|
| 708.83 SF Walls | 490.28 SF Ceiling |
| 1199.11 SF Walls & Ceiling | 490.28 SF Floor |
| 54.48 SY Flooring | 88.60 LF Floor Perimeter |
| 88.60 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------------|---------------|-----------------|---------------|---------------|
| 121. R&R Acoustic ceiling tile | 122.57 SF | 3.43 | 11.25 | 86.34 | 518.01 | (186.67) | 331.34 |
| 122. Seal & paint acoustic ceiling tile | 490.28 SF | 0.95 | 8.53 | 94.86 | 569.16 | (284.60) | 284.56 |
| Totals: Room1 | | | 19.78 | 181.20 | 1,087.17 | 471.27 | 615.90 |



Room7

Height: 8'

| | |
|----------------------------|--------------------------|
| 703.54 SF Walls | 483.16 SF Ceiling |
| 1186.71 SF Walls & Ceiling | 483.16 SF Floor |
| 53.68 SY Flooring | 87.94 LF Floor Perimeter |
| 87.94 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------------|---------------|-----------------|---------------|-----------------|
| 123. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 120.79 SF | 1.84 | 3.55 | 45.18 | 270.99 | (92.50) | 178.49 |
| 124. R&R Acoustic ceiling tile furring | 120.79 SF | 0.81 | 1.45 | 19.86 | 119.15 | (34.82) | 84.33 |
| 125. R&R Acoustic ceiling tile | 120.79 SF | 3.43 | 11.09 | 85.08 | 510.48 | (183.96) | 326.52 |
| 126. Seal & paint acoustic ceiling tile | 483.16 SF | 0.95 | 8.41 | 93.48 | 560.89 | (280.45) | 280.44 |
| 127. Paint masonry | 703.54 SF | 0.69 | 11.82 | 99.44 | 596.70 | (298.35) | 298.35 |
| 128. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 129. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| Totals: Room7 | | | 36.96 | 353.86 | 2,123.21 | 922.59 | 1,200.62 |



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| Room3 | | Height: 8' |
|----------------------------|---------------------------|-------------------|
| 36' 1" | 35' 9" | |
| Room3 | | |
| 9' 3" | 8' 11" | |
| 9' 3" | 8' 11" | |
| 9' 3" | 8' 11" | |
| | | |
| 1137.52 SF Walls | 764.99 SF Ceiling | |
| 1902.51 SF Walls & Ceiling | 764.99 SF Floor | |
| 85.00 SY Flooring | 142.19 LF Floor Perimeter | |
| 142.19 LF Ceil. Perimeter | | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------------|-------------------|---------------|-----------------|------------------|-----------------|-----------------|
| 130. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 191.25 SF | 1.84 | 5.62 | 71.50 | 429.02 | (146.44) | 282.58 |
| 131. R&R Acoustic ceiling tile furring | 191.25 SF | 0.81 | 2.30 | 31.44 | 188.65 | (55.13) | 133.52 |
| 132. R&R Acoustic ceiling tile | 191.25 SF | 3.43 | 17.56 | 134.72 | 808.27 | (291.29) | 516.98 |
| 133. Seal & paint acoustic ceiling tile | 764.99 SF | 0.95 | 13.31 | 148.00 | 888.05 | (444.03) | 444.02 |
| 134. R&R Fluorescent light fixture | 2.00 EA | 112.41 | 6.27 | 46.22 | 277.31 | (249.21) | 28.10 |
| 135. Paint masonry | 1,137.52 SF | 0.69 | 19.11 | 160.80 | 964.80 | (482.41) | 482.39 |
| 136. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 137. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| HAZ-MAT | | | | | | | |
| 138. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 139. Tear out asbestos vinyl floor covering (no haul off) | 764.99 SF | 2.84 | 7.80 | 436.08 | 2,616.45 | (0.00) | 2,616.45 |
| 140. Remove asbestos floor mastic (no haul off) | 764.99 SF | 3.47 | 2.30 | 531.36 | 3,188.18 | (0.00) | 3,188.18 |
| 141. HEPA Vacuuming - Detailed - (PER SF) | 764.99 SF | 0.75 | 41.30 | 114.74 | 729.78 | (0.00) | 729.78 |
| 142. Clean the floor | 764.99 SF | 0.50 | 28.04 | 76.60 | 487.14 | (0.00) | 487.14 |
| 143. Floor leveling cement / patch-in | 764.99 SF | 2.50 | 34.42 | 389.38 | 2,336.28 | (2,336.28) | 0.00 |
| 144. Vinyl tile | 764.99 SF | 3.51 | 101.44 | 557.30 | 3,343.85 | (3,343.85) | 0.00 |
| 145. Cove base molding - rubber or vinyl, 6" high | 142.19 LF | 2.46 | 14.50 | 72.86 | 437.15 | (437.15) | 0.00 |
| Totals: Room3 | | | 295.97 | 2,785.36 | 16,782.47 | 7,818.30 | 8,964.17 |

| Room8 | | Height: 8' |
|----------------------------|--------------------------|-------------------|
| 22' 4" | 22' | |
| Room8 | | |
| 8' 11" | 8' 11" | |
| 8' 11" | 8' 11" | |
| 8' 11" | 8' 11" | |
| 696.04 SF Walls | 473.07 SF Ceiling | |
| 1169.11 SF Walls & Ceiling | 473.07 SF Floor | |
| 52.56 SY Flooring | 87.01 LF Floor Perimeter | |
| 87.01 LF Ceil. Perimeter | | |

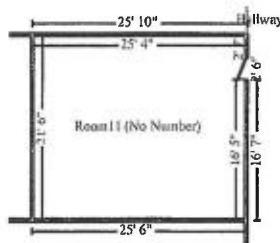
| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|----------------------|-----------------|-------------------|------------|----------------|------------|----------------|------------|
| 18010765-UNITED-MUSL | | | | | 12/4/2018 | | Page: 13 |

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CONTINUED - Room8

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------|----------|-----------|------------|----------|
| 146. R&R Drywall - hung, taped, ready for texture - substrate for ceiling tile* | 118.27 SF | 1.84 | 3.48 | 44.22 | 265.31 | (90.57) | 174.74 |
| 147. R&R Acoustic ceiling tile furring | 118.27 SF | 0.81 | 1.42 | 19.44 | 116.66 | (34.10) | 82.56 |
| 148. R&R Acoustic ceiling tile | 118.27 SF | 3.43 | 10.86 | 83.30 | 499.83 | (180.12) | 319.71 |
| 149. Seal & paint acoustic ceiling tile | 473.07 SF | 0.95 | 8.23 | 91.52 | 549.17 | (274.59) | 274.58 |
| 150. R&R Fluorescent light fixture | 2.00 EA | 112.41 | 6.27 | 46.22 | 277.31 | (249.21) | 28.10 |
| 151. Paint masonry | 696.04 SF | 0.69 | 11.69 | 98.40 | 590.36 | (295.19) | 295.17 |
| 152. Paint door/window trim & jamb - 2 coats (per side) | 1.00 EA | 24.32 | 0.24 | 4.90 | 29.46 | (14.74) | 14.72 |
| 153. Paint door slab only - 2 coats (per side) | 1.00 EA | 29.22 | 0.40 | 5.92 | 35.54 | (17.77) | 17.77 |
| HAZ-MAT | | | | | | | |
| 154. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 21.00 SF | 0.84 | 1.36 | 3.54 | 22.54 | (0.00) | 22.54 |
| 155. Tear out asbestos vinyl floor covering (no haul off) | 473.07 SF | 2.84 | 4.83 | 269.66 | 1,618.01 | (0.00) | 1,618.01 |
| 156. Remove asbestos floor mastic (no haul off) | 473.07 SF | 3.47 | 1.42 | 328.60 | 1,971.57 | (0.00) | 1,971.57 |
| 157. HEPA Vacuuming - Detailed - (PER SF) | 473.07 SF | 0.75 | 25.55 | 70.96 | 451.31 | (0.00) | 451.31 |
| 158. Clean the floor | 473.07 SF | 0.50 | 17.33 | 47.36 | 301.23 | (0.00) | 301.23 |
| 159. Floor leveling cement / patch-in | 473.07 SF | 2.50 | 21.29 | 240.80 | 1,444.77 | (1,444.77) | 0.00 |
| 160. Vinyl tile | 473.07 SF | 3.51 | 62.73 | 344.64 | 2,067.85 | (2,067.85) | 0.00 |
| 161. Cove base molding - rubber or vinyl, 6" high | 87.01 LF | 2.46 | 8.88 | 44.58 | 267.50 | (267.50) | 0.00 |
| Totals: Room8 | | | 185.98 | 1,744.06 | 10,508.42 | 4,936.41 | 5,572.01 |



Room11 (No Number)

Height: 8'

| | |
|----------------------------|--------------------------|
| 750.27 SF Walls | 546.04 SF Ceiling |
| 1296.31 SF Walls & Ceiling | 546.04 SF Floor |
| 60.67 SY Flooring | 93.78 LF Floor Perimeter |
| 93.78 LF Ceil. Perimeter | |

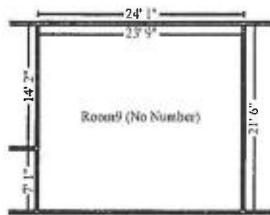
| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|------------------------------------|----------|------------|------|-------|--------|----------|-------|
| 162. R&R Fluorescent light fixture | 2.00 EA | 112.41 | 6.27 | 46.22 | 277.31 | (249.21) | 28.10 |



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CONTINUED - Room11 (No Number)

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------------|---------------|-----------------|-----------------|-----------------|
| 163. Detach & Reset Fluorescent light fixture | 2.00 EA | 72.64 | 0.00 | 29.06 | 174.34 | (0.00) | 174.34 |
| 164. R&R Acoustic ceiling tile furring | 546.04 SF | 0.81 | 6.55 | 89.78 | 538.62 | (157.42) | 381.20 |
| 165. R&R Acoustic ceiling tile | 546.04 SF | 3.43 | 50.13 | 384.60 | 2,307.65 | (831.61) | 1,476.04 |
| Totals: Room11 (No Number) | | | 62.95 | 549.66 | 3,297.92 | 1,238.24 | 2,059.68 |



Room9 (No Number)

Height: 8'

| | |
|----------------------------|--------------------------|
| 723.98 SF Walls | 510.66 SF Ceiling |
| 1234.64 SF Walls & Ceiling | 510.66 SF Floor |
| 56.74 SY Flooring | 90.50 LF Floor Perimeter |
| 90.50 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|--------------|---------------|-----------------|-----------------|-----------------|
| 166. R&R Fluorescent light fixture | 3.00 EA | 112.41 | 9.41 | 69.32 | 415.96 | (373.81) | 42.15 |
| 167. Detach & Reset Fluorescent light fixture | 5.00 EA | 72.64 | 0.00 | 72.64 | 435.84 | (0.00) | 435.84 |
| 168. R&R Acoustic ceiling tile furring | 510.66 SF | 0.81 | 6.13 | 83.96 | 503.73 | (147.22) | 356.51 |
| 169. R&R Acoustic ceiling tile | 510.66 SF | 3.43 | 46.88 | 359.68 | 2,158.12 | (777.73) | 1,380.39 |
| Totals: Room9 (No Number) | | | 62.42 | 585.60 | 3,513.65 | 1,298.76 | 2,214.89 |

Corridor

Height: 8'



| | |
|----------------------------|---------------------------|
| 2327.09 SF Walls | 1392.50 SF Ceiling |
| 3719.59 SF Walls & Ceiling | 1392.50 SF Floor |
| 154.72 SY Flooring | 290.39 LF Floor Perimeter |
| 293.39 LF Ceil. Perimeter | |

Missing Wall

9' 10" X 8'

Opens into HALLWAY_ST

Missing Wall - Goes to Floor

3' X 6' 8"

Opens into WOMENS_BATH

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|----------------------|----------|------------|-----|-----|-----|---------|-----|
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12/4/2018

Page: 15



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CONTINUED - Corridor

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-------------|------------|---------------|---------------|-----------------|-----------------|-----------------|
| 170. R&R Acoustic ceiling tile | 4.00 SF | 3.43 | 0.37 | 2.82 | 16.91 | (6.10) | 10.81 |
| 171. Seal & paint acoustic ceiling tile | 1,392.50 SF | 0.95 | 24.23 | 269.42 | 1,616.53 | (808.28) | 808.25 |
| 172. Clean floor | 1,392.50 SF | 0.34 | 34.09 | 94.70 | 602.24 | (0.00) | 602.24 |
| 173. Clean the walls | 2,327.09 SF | 0.26 | 45.07 | 121.28 | 771.39 | (0.00) | 771.39 |
| 174. Paint the walls - two coats | 2,327.09 SF | 0.77 | 27.93 | 363.96 | 2,183.75 | (1,091.88) | 1,091.87 |
| Totals: Corridor | | | 131.69 | 852.18 | 5,190.82 | 1,906.26 | 3,284.56 |

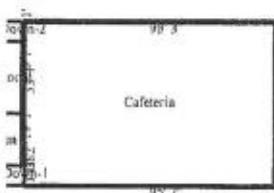


Room6 (No Number)

Height: 8'

| | |
|----------------------------|--------------------------|
| 709.42 SF Walls | 491.07 SF Ceiling |
| 1200.49 SF Walls & Ceiling | 491.07 SF Floor |
| 54.56 SY Flooring | 88.68 LF Floor Perimeter |
| 88.68 LF Ceil. Perimeter | |

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-----------|------------|-------------|---------------|---------------|---------------|---------------|
| 175. R&R Acoustic ceiling tile | 8.00 SF | 3.43 | 0.73 | 5.62 | 33.79 | (12.17) | 21.62 |
| 176. Seal & paint acoustic ceiling tile | 491.07 SF | 0.95 | 8.54 | 95.00 | 570.06 | (285.03) | 285.03 |
| Totals: Room6 (No Number) | | | 9.27 | 100.62 | 603.85 | 297.20 | 306.65 |



Cafeteria

Height: 8'

| | |
|----------------------------|---------------------------|
| 2463.56 SF Walls | 5778.50 SF Ceiling |
| 8242.06 SF Walls & Ceiling | 5778.50 SF Floor |
| 642.06 SY Flooring | 307.17 LF Floor Perimeter |
| 311.83 LF Ceil. Perimeter | |

Missing Wall - Goes to Floor

4' 8" X 6' 8"

Opens into STAIRWAY_DO

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-------------|------------|-------|--------|----------|------------|----------|
| 177. Paint masonry | 2,463.56 SF | 0.69 | 41.39 | 348.26 | 2,089.51 | (1,044.77) | 1,044.74 |
| 178. Paint door/window trim & jamb - 2 coats (per side) | 5.00 EA | 24.32 | 1.19 | 24.56 | 147.35 | (73.68) | 73.67 |



1845 Walnut St. Suite 2300
 Philadelphia, PA 19103
 (P) 267-479-0410
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CONTINUED - Cafeteria

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|-------------|-----------------|------------------|-------------------|------------------|------------------|-----------|
| HAZ-MAT | | | | | | | |
| 179. Containment Barrier/Airlock/Decon. Chamber - portal egress/ingress* | 762.00 SF | 0.84 | 49.52 | 128.66 | 818.26 | (0.00) | 818.26 |
| 180. Finish Carpenter - per hour - labor time to detach/reset folding partition door to facilitate floor replacement* | 32.00 HR | 63.75 | 0.00 | 408.00 | 2,448.00 | (0.00) | 2,448.00 |
| 181. Tear out asbestos vinyl floor covering (no haul off) | 5,778.50 SF | 2.84 | 58.94 | 3,293.96 | 19,763.84 | (0.00) | 19,763.84 |
| 182. Remove asbestos floor mastic (no haul off) | 5,778.50 SF | 3.47 | 17.34 | 4,013.74 | 24,082.48 | (0.00) | 24,082.48 |
| 183. HEPA Vacuuming - Detailed - (PER SF) | 5,778.50 SF | 0.75 | 312.04 | 866.78 | 5,512.70 | (0.00) | 5,512.70 |
| 184. Clean the floor | 5,778.50 SF | 0.50 | 211.74 | 578.56 | 3,679.55 | (0.00) | 3,679.55 |
| 185. Floor leveling cement / patch-in | 5,778.50 SF | 2.50 | 260.03 | 2,941.26 | 17,647.54 | (17,647.54) | 0.00 |
| 186. Vinyl tile | 5,778.50 SF | 3.51 | 766.23 | 4,209.74 | 25,258.51 | (25,258.51) | 0.00 |
| 187. Cove base molding - rubber or vinyl, 6" high | 307.17 LF | 2.46 | 31.33 | 157.38 | 944.35 | (944.35) | 0.00 |
| Totals: Cafeteria | | 1,749.75 | 16,970.90 | 102,392.09 | 44,968.85 | 57,423.24 | |

| | | | | | |
|--------------------------|-----------------|------------------|-------------------|------------------|------------------|
| Total: Main Level | 2,865.41 | 27,135.74 | 163,643.52 | 72,269.70 | 91,373.82 |
|--------------------------|-----------------|------------------|-------------------|------------------|------------------|

General Conditions

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|----------|------------|--------|----------|----------|---------|----------|
| 188. Commercial Supervision / Project Management - per hour | 24.00 HR | 74.50 | 0.00 | 357.60 | 2,145.60 | (0.00) | 2,145.60 |
| 189. General Laborer - per hour - h/d materials, general cleaning* | 16.00 HR | 37.53 | 0.00 | 120.10 | 720.58 | (0.00) | 720.58 |
| 190. Dumpster load - used for general demolition debris* | 1.00 EA | 761.00 | 0.00 | 152.20 | 913.20 | (0.00) | 913.20 |
| 191. Hazardous Waste/Mold Cleaning-Supervisory/Admin- per hour - full time supervision for abatement project* | 80.00 HR | 74.38 | 428.42 | 1,190.08 | 7,568.90 | (0.00) | 7,568.90 |
| 192. Neg. air fan/Air scrub.-XLrg (per 24 hr period)-No monit. - allow 1 unit per room/area for 2 days* | 24.00 DA | 140.00 | 241.92 | 672.00 | 4,273.92 | (0.00) | 4,273.92 |
| 193. Carbon vapor filter (for air scrubber) - 24" x 24" | 6.00 EA | 102.80 | 79.14 | 129.84 | 825.78 | (0.00) | 825.78 |
| 194. Dumpster load - asbestos abatement container | 1.00 EA | 1,400.00 | 100.80 | 280.00 | 1,780.80 | (0.00) | 1,780.80 |



1845 Walnut St. Suite 2300
 Philadelphia, PA 19103
 (P) 267-479-0410
 (F) 267-479-0415

CONTINUED - General Conditions

| DESCRIPTION | QUANTITY | UNIT PRICE | TAX | O&P | RCV | DEPREC. | ACV |
|---|---------------|------------|-----------------|------------------|-------------------|-------------------|-------------------|
| 195. Asbestos test fee - post abatement testing* | 1.00 EA | 500.00 | 36.00 | 100.00 | 636.00 | (0.00) | 636.00 |
| 196. Final cleaning - construction - Commercial | 16,087. SF 00 | 0.15 | 173.74 | 482.62 | 3,069.41 | (0.00) | 3,069.41 |
| 197. Taxes, insurance, permits & fees - TBD/excluded* | 1.00 EA | 0.00 | 0.00 | 0.00 | 0.00 | (0.00) | 0.00 |
| Totals: General Conditions | | | 1,060.02 | 3,484.44 | 21,934.19 | 0.00 | 21,934.19 |
| Line Item Totals: 18010765-UNITED-MUSL | | | 5,405.70 | 43,735.80 | 264,672.06 | 110,233.46 | 154,438.60 |

Grand Total Areas:

| | | |
|------------------------------|--------------------------------------|--------------------------------|
| 33,815.11 SF Walls | 24,350.71 SF Ceiling | 58,165.82 SF Walls and Ceiling |
| 24,350.71 SF Floor | 2,705.63 SY Flooring | 4,205.94 LF Floor Perimeter |
| 0.00 SF Long Wall | 0.00 SF Short Wall | 4,331.61 LF Ceil. Perimeter |
| 24,350.71 Floor Area | 25,287.13 Total Area | 34,259.22 Interior Wall Area |
| 11,288.28 Exterior Wall Area | 1,254.25 Exterior Perimeter of Walls | |
| 0.00 Surface Area | 0.00 Number of Squares | 0.00 Total Perimeter Length |
| 0.00 Total Ridge Length | 0.00 Total Hip Length | |



1845 Walnut St. Suite 2300
 Philadelphia, PA 19103
 (P) 267-479-0410
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Summary

| | |
|---|---------------------|
| Line Item Total | 215,530.56 |
| Material Sales Tax | 3,096.77 |
| Cleaning Mtl Tax | 52.09 |
| Subtotal | 218,679.42 |
| Overhead | 21,867.90 |
| Profit | 21,867.90 |
| Cleaning Sales Tax | 2,256.84 |
| Replacement Cost Value | \$264,672.06 |
| Less Depreciation | (110,233.46) |
| Actual Cash Value | \$154,438.60 |
| Net Claim | \$154,438.60 |
| Total Recoverable Depreciation | 110,233.46 |
| Net Claim if Depreciation is Recovered | \$264,672.06 |



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 (P) 267-479-0410
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Recap of Taxes, Overhead and Profit

| | Overhead (10%) | Profit (10%) | Material Sales Tax (6%) | Cleaning Mtl Tax (6%) | Cleaning Sales Tax (6%) | Clothing Acc Tax (6%) | Manuf. Home Tax (6%) | Storage Rental Tax (6%) |
|-------------------|-------------------|------------------|----------------------------|--------------------------|----------------------------|--------------------------|-------------------------|----------------------------|
| Line Items | | | | | | | | |
| | 21,867.90 | 21,867.90 | 3,096.77 | 52.09 | 2,256.84 | 0.00 | 0.00 | 0.00 |
| Total | | | | | | | | |
| | 21,867.90 | 21,867.90 | 3,096.77 | 52.09 | 2,256.84 | 0.00 | 0.00 | 0.00 |



1845 Walnut St. Suite 2300
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 (P) 267-479-0410
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Recap by Room

Estimate: 18010765-UNITED-MUSL

Area: 2nd Floor

| | | |
|-------------------|-----------|-------|
| Room13 | 13,472.13 | 6.25% |
| Bathroom-1 | 2,696.89 | 1.25% |
| Room2 (No Number) | 8,357.65 | 3.88% |
| Room11 | 8,003.31 | 3.71% |
| Room4 (No Number) | 659.38 | 0.31% |
| Room5 (Office) | 1,070.76 | 0.50% |
| Room9 | 11,211.09 | 5.20% |
| Room10 | 11,358.53 | 5.27% |
| Room8 | 4,543.25 | 2.11% |
| Room12 | 2,115.91 | 0.98% |
| Corridor | 1,009.56 | 0.47% |

| | | |
|--------------------------|-----------|--------|
| Area Subtotal: 2nd Floor | 64,498.46 | 29.93% |
|--------------------------|-----------|--------|

Area: Main Level

| | | |
|--------------------|-----------|--------|
| Room5 | 13,578.81 | 6.30% |
| Sump Room | 693.11 | 0.32% |
| Room6 | 549.06 | 0.25% |
| Room1 | 886.19 | 0.41% |
| Room7 | 1,732.39 | 0.80% |
| Room3 | 13,701.14 | 6.36% |
| Room8 | 8,578.38 | 3.98% |
| Room11 (No Number) | 2,685.31 | 1.25% |
| Room9 (No Number) | 2,865.63 | 1.33% |
| Corridor | 4,206.95 | 1.95% |
| Room6 (No Number) | 493.96 | 0.23% |
| Cafeteria | 83,671.44 | 38.82% |

| | | |
|---------------------------|------------|--------|
| Area Subtotal: Main Level | 133,642.37 | 62.01% |
| General Conditions | 17,389.73 | 8.07% |

| | | |
|-------------------|------------|---------|
| Subtotal of Areas | 215,530.56 | 100.00% |
|-------------------|------------|---------|

| | | |
|-------|------------|---------|
| Total | 215,530.56 | 100.00% |
|-------|------------|---------|



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 (P) 267-479-0410
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Recap by Category with Depreciation

| O&P Items | RCV | Deprec. | ACV |
|--------------------------------|-------------------|-------------------|-------------------|
| ACOUSTICAL TREATMENTS | 8,025.57 | 3,370.74 | 4,654.83 |
| CABINETRY | 382.13 | | 382.13 |
| CLEANING | 4,501.10 | | 4,501.10 |
| CONCRETE & ASPHALT | 28,333.79 | 28,333.79 | 0.00 |
| GENERAL DEMOLITION | 75,696.88 | | 75,696.88 |
| DRYWALL | 1,373.52 | 576.86 | 796.66 |
| FLOOR COVERING - CARPET | 3,103.03 | 3,103.03 | 0.00 |
| FLOOR COVERING - VINYL | 43,351.51 | 43,351.51 | 0.00 |
| FINISH CARPENTRY / TRIMWORK | 2,040.00 | | 2,040.00 |
| FINISH HARDWARE | 92.82 | | 92.82 |
| HAZARDOUS MATERIAL REMEDIATION | 26,792.97 | | 26,792.97 |
| LABOR ONLY | 2,388.48 | | 2,388.48 |
| LIGHT FIXTURES | 2,528.82 | 2,020.34 | 508.48 |
| PAINTING | 16,749.92 | 8,375.01 | 8,374.91 |
| STUCCO & EXTERIOR PLASTER | 170.02 | 107.11 | 62.91 |
| O&P Items Subtotal | 215,530.56 | 89,238.39 | 126,292.17 |
| Material Sales Tax | 3,096.77 | 2,622.75 | 474.02 |
| Cleaning Mtl Tax | 52.09 | | 52.09 |
| Overhead | 21,867.90 | 9,186.16 | 12,681.74 |
| Profit | 21,867.90 | 9,186.16 | 12,681.74 |
| Cleaning Sales Tax | 2,256.84 | | 2,256.84 |
| Total | 264,672.06 | 110,233.46 | 154,438.60 |

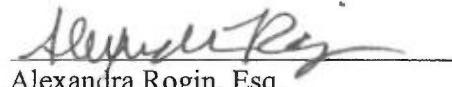
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Defendant's Notice of Removal was served via email and first-class U.S. Mail, postage prepaid, this 7th day of May, 2019, on the following counsel of record:

Stan Shnayder, Esq.
Kats, Jamison & Associates
1 Bustleton Pike
Feasterville, PA 19053

Steven Feinstein, Esq.
Feinstein Law Office
107 Wayne Court
West Chester, PA 19380

Counsel for Plaintiff



Alexandra Rogin, Esq.